

September 25, 1995

Mr. Ken Theisen (HSE-5J)
USEPA Region V
77 West Jackson Blvd.
Chicago, IL 60604-3590

EPA Region 5 Records Ctr.



224208

Re: U.S. v. Accra Pac and Estate of Warner Baker
Air Emissions

Dear Ken:

The subject of air stripper emissions was discussed with you on September 7, 1995. The purpose of this letter is to summarize those discussions which delineated how Accra Pac will assure compliance of the air stripper emissions with the RCRA air emission limitations, unless and until a determination is made that the RCRA limitations are not the ARARs for this clean-up action.

The following means of assuring compliance will be employed:

- 1) The influent groundwater to the air stripper (i.e. the 'waste') will be maintained at an average Volatile Organic (VO) concentration of less than 100 ppmw (as determined by the test procedures specified in Part 264 on a mutually acceptable test schedule), so that the Part 264 air emission standards will not apply, by the following means:

-Bio-sparging, bio-venting, sparging and/or soil vapor extraction will be performed to reduce VO levels before the air stripping of the groundwater is initiated.

-If necessary the blending of the groundwater from the less contaminated recovery well with that from the more contaminated well may be manipulated to lower the VO concentration in the influent to the air stripper.

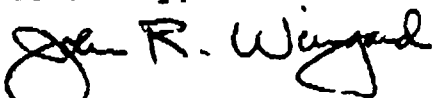
-Other physical and/or operational methods that may be identified by the planned additional work might also be utilized.

- 2) Should Accra Pac not be able to keep the influent groundwater concentration to less than 100 ppmw of VO, then Accra Pac will monitor the air stripper VO air emissions using a mutually acceptable method. If the

emissions are found to be at a level below the RCRA standard, no air pollution controls will be needed. If the emissions are found to be at a level which would exceed the RCRA standard, Accra Pac will operate the system in such a way to keep the emissions below the RCRA standard pending resolution of the ARARS issue. This would be accomplished by operational controls (decreasing the pumping rate and/or hours of operation), through the use of low cost engineering controls if proposed by Accra Pac and accepted by EPA, or some other mutually acceptable method.

We appreciate your time and input at the meeting. We believe this approach will assure compliance and effectively address your concerns.

Sincerely,

A handwritten signature in dark ink, appearing to read "John R. Wingard". The signature is fluid and cursive, with the first name "John" being more prominent.

John R. Wingard
Director of Environmental Affairs